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January 22, 2014

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire
Chief Clerk and Administrator
Public Service Commission of South Carolina
101 Executive Center Drive
Columbia, South Carolina 29210

Re: Application of Lockhart Power Company for Waiver of Commission Regulations 103-352 (a) and (b)
Docket No. 2014-19-E

Dear Ms. Boyd:


The Office of Regulatory Staff ("ORS") has reviewed and discussed with Lockhart Power Company ("Lockhart" or "Company") representatives, the REVISED filing in this Docket and does not oppose the Company's request for waiver of a certain Commission Regulation included in Rule 103-352, 'Procedures for Termination of Service,' pertaining to notifications. Lockhart's REVISED Petition specifically seeks a waiver of Commission Regulation 103-352(a)2, in order that the Company may continue to bill for certain municipal services on behalf of the Town of Lockhart (the "Town").

There are approximately 250 customers within the Town subject to the combined billing and the Town compensates Lockhart for performing this billing function. This combined billing is a legacy function of the Company carried over at the time Lockhart divested its water and sewer system and services to the Town in 1996. This billing arrangement occurred as a result of the overall economy of Lockhart continuing to bill these few customers combined with the Town's lack of an established appropriate billing system along with associated expenses, and the lack of resources necessary to implement its own separate billing program.

The Company has indicated it has received no complaints concerning the combined billing from any of the affected customers and if a change to its termination notices were to be required, the result would be additional costs for its ratepayers. ORS has received only one complaint and it was only tangentially related to the issue of combined billing.

Thank you for the opportunity to provide comments in this matter.

Sincerely,



John W. Flitter

JWF/sh

cc: Dan F. Arnett, Chief of Staff, ORS
Nanette Edwards, Chief Counsel and Director of Legal Services and Telecommunications, ORS
Courtney D. Edwards, Esquire, ORS
M. John Bowen, Jr., Esquire, McNair Law Firm, P.A. for Lockhart Power Company
Dr. James Spearman, Executive Assistant to SCPSC